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RICHARD W. NAGEL, CLERK OF COURT  
COLUMBUS, OHIO

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
\_\_\_\_\_  
DIVISION

2:22-cv-1960

Gerelle Guillard

(Enter Above the Name of the Plaintiff in this Action)

VS.

City of Athens, Andy Russell, Steve Patterson,  
Carly Ferguson, Mandi-Knott-Cain  
(Enter above the name of the Defendant in this Action)

If there are additional Defendants, please list them:

Campus Height, Ricky Husell  
Athens Municipal Courts, Clerks of Courts.  
Kara Boliw, Tom Gibbs, Mike Dewine, Dave Yost  
Steven Roach, Tom Pyle, Derrick Johnson, Andrew Foster  
Ross Holter, Nick McGruder, Bob Blackburn, Angela Hall  
Rodney Smith, Bob Blackburn, Caitlyn McDonnell  
Scals, Accs, Accsd, Athens Police, Athens Sheriffs Dept  
Ron Hawk.

COMPLAINT

I. Parties to the action:

Plaintiff: Place your name and address on the lines below. The address you give must be the address where the court may contact you and mail documents to you. A telephone number is required.

Gerelle Guillard

Name - Full Name Please - PRINT

1117 Carriage Hill Dr

Street Address

Athens, OH 45701

City, State and Zip Code

(740) 818-0399

Telephone Number

If there are additional Plaintiffs in this suit, a separate piece of paper should be attached immediately behind this page with their full names, addresses and telephone numbers. If there are no other Plaintiffs, continue with this form.

Defendant(s): Attached paper

Place the name and address of each Defendant you listed in the caption on the first page of this Complaint. This form is invalid unless each Defendant appears with full address for proper service.

1. Kara Berlin  
Name - Full Name Please  
5996 Rossetter Rd Albany OH 45710  
Address: Street, City, State and Zip Code
2. Tom Gibbs  
12 Birge Dr Chauncey OH 45719
3. Steven Rorich  
12 Birge Dr Chauncey OH 45719
4. \_\_\_\_\_
5. \_\_\_\_\_
6. \_\_\_\_\_

If there are additional Defendants, please list their names and addresses on a separate sheet of paper.

## II. Subject Matter Jurisdiction

Check the box or boxes that describes your lawsuit:

- ☒ Title 28 U.S.C. § 1343(3)  
[A civil rights lawsuit alleging that Defendant(s) acting under color of State law, deprived you of a right secured by federal law or the Constitution.]
- ☐ Title 28 U.S.C. § 1331  
[A lawsuit "arising under the Constitution, laws, or treaties of the United States."]
- ☐ Title 28 U.S.C. § 1332(a)(1)  
[A lawsuit between citizens of different states where the matter in controversy exceeds \$75,000.]
- ☒ Title 42 United States Code, Section 1983  
[Other federal status giving the court subject matter jurisdiction.]

Title 18 U.S.C 242  
Title 42 U.S.C. 12132  
Title 18 U.S.C. 1512  
Title 31 U.S.C. 6711  
Title 51 U.S.C 20137

1<sup>st</sup>, 6<sup>th</sup>, 5<sup>th</sup>, 14<sup>th</sup> Amendment.

Title 5. U.S.C 706  
Title 42 U.S.C 12203

III. Statement of Claim

Please write as briefly as possible the facts of your case. Describe how each Defendant is involved. Include the name of all persons involved, give dates and places.

Number each claim separately. Use as much space as you need. You are not limited to the papers we give you. Attach extra sheets that deal with your statement claim immediately behind this piece of paper.

Claim is attached to this form

1. Kara Bolin, March 2, 2022- at Athens middle school HID the fact that she was aware of my son was assaulted, when she followed up with her report with Athens city police. She tampered with evidence, and witnesses telling them to delete videos and or audios, she unfairly punish my son for a photo being leaked out with over 50 children. Kara, call the police and filed a report with allegations of sexual misconduct, but there were no findings it was reported by officer Andrew Foster where he put an F1 charge of decimating a minor, which I believe is profiling my son for a future event. She also defame my character knowing that I am a realtor by telling us fellow students Mother who I have spoke with saying I am not a good person and I may steal her money via go fund me. This parent gave us permission to make this go fund me for her son who committed suicide. . She made my son speak with her when he did not want to. She confiscated his cell phone and look through it. She threatened to get him in more trouble with me. She has past judgment on me and my son because we are living a low income apartment complex where I have emailed Tom Gibbs about this. She did not follow proper protocols and procedures pertaining to the second assault of racial intimidations by another student who broke my sons finger. And she would not come down and communicate with me about the protocols for racial Intimidation. She failed to report child abuse. She made frivolous reports. And she failed to provide equal protection.as well as deformation of character. As well as depriving liberty of due process.failure to train
2. Tom Gibbs March 3, 2022- Superintendent of Athens city school was on vacation when I sent a string of emails detailing the multiple assaults on my son. Tom was not in Ohio and did not have a formal consultation with me about this matter, before making his findings, which he said never happened, and relieve Jeff Skinner of any allegations. And this was not the first time he was excused him there has been other similar allegations, that I informed children services about, to no avail. The fi he was negligent with a substantial evidence, I provided stating Mr Skinner did a bad thing via the children at schools text messages. Tom's decision was made before speaking to me or my son. He refused to accommodate my sons doctors know explaining my sons increase in anxiety and he needs to be home, I was represented but no longer AM, Tom emailed me Taunting me about not having representation. Intentionally causing emotional duress, I informed his legal counsel to having to stop harassing me, a concerned parent. He also tampered with the evidence I sent mass e-mail with evidence he also failed to provide equal protection as well as equal accommodations regarding my son's iep or his safety. He would not implement my safety plan, he acted and arrest making threats to trespass me and not allow me to come to my son school anymore he failed to provide equal protection under the equal protection laws as well as deprivation of liberty and due process.failure to Train.
3. Steven Roach March2,2022- the assistant principal at Athens middle school failed to report child abuse, he was also mass emailed with evidence. He also endangered the minor, when I was at the first meeting with Kara she started to get combative, Steven stepped in the way. Between the both of us, he heard the whole conversation and did not report the abuse. A month later I had an I had an iep meeting, with his iep staff but the purpose of the meeting for me was for my son safety for him to return back to school. But that was not the case. Stephen Roach admitted but they were allegations of multiple assaults towards Elijah. Go on to say Elijah was safe after no safety measures were taken. He refused to be my son safety person in an event of another assault. By never responding back to the e-mail with the safety plan. He failed to follow school policies and procedures and failed to provide equal protection. Depriving liberty as well as due process. Failure to train.

4. Jeff Skinner March 2, 2022- the history teacher at Athens middle school assaulted my son by pushing him during class, excessively punishing him by kicking him out. The last time we pushed him out, really hard and told him it's March is not your month anymore. My son would go on to punch a locker. Jeff Skinner offered to take him to the nurse. My son refused and he would go on later to report to Tom Gibbs that this never happened. But I do have it documented when I took him to the emergency room for his finger being broken by the other student. Racial intimidation, causing my sons anxiety to become extreme to the point where he did not return back to school. and failure to train
5. Angela Hall was assigned to be my son's new history teacher due to the assault she entered the meeting and as I was speaking to her about the abuse she interrupted me saying I don't want to hear anymore I don't wanna hear it. Failing to report an assault on a minor. Failing to provide equal protection. failure to train
6. Athens County children services employee Mandy Knowlton Cain Both called on my account after Tom Gibbs dismissed the assault charges. I called to report the students were endangered due to this teacher being allowed to assault my son. It was dismissed with no further services offered period until due to this lawsuit bogus reports started to be called in from Athens middle school I was accused by Steven Roach Kristi Diki Doug Woodruff and Bob Blackburn, saying that I did not attend the school's IEP safety meeting, No one was reprimanded for making that false report. They failed to report child abuse and failed to provide equal protection. depriving me of liberty and substantial due process failure to Train
7. Mandy Knowlton Kane is a children service employee, I called her explaining my concern towards this teacher. Wishing you not keep in contact with me like she promised. I called multiple times trying to get in touch with her. I sent her an email with a screenshot of Jeff Skinner being accused of assaulting three children in one day. Mandy tampered with evidence I sent her all the evidence I had she never reported child abuse. She never responded back. She did an investigation to where she said they had no findings. And dismissed the case with no assistance offered. depriving me of substantial due process failure to Train
8. Carly Ferguson A children service employee came to my home I was not there on a false allegation from the middle school as well as allegations of me having a gun in my home and not being mentally stable. Where she called the police, and they mentioned to her about my gun. She and eight other cops came to my door I was not home she asked my son if he felt safe and she left. I called her back volunteering to explain the whole situation about the police my family. She came over I gave her all the evidence I had. She failed to report child abuse. Depriving me liberty and substantial due process. And failure to train.
9. Derrick Johnson a police officer for Athens City Police along with Ross Holter we're the first officers on call. I called them about Jeff Skinner assaulting my son. Derrick walked into the class room and addressed Jeff Skinner. But later would report he did not know his name. When I called him about the follow up he said the judge would just roll this out and not to pursue it. He also lied and said that Tom Pyle the police chief was on vacation and would be back on Monday, Tom Pyle will confirm he was there in a later interview me and Tom had. He also tampered with evidence, failed to report child abuse, Failed to equally protect. Depriving liberty and substantial due process failure to train



10. Ross Holter in Athens city police officer was one of the first officers on call along with Derek Johnson. I try to contact him In regards to this case he never responded. He failed to report child abuse, and he failed to equally protect Deprived liberty and substantial due process and Failure to Train.
11. Nick Mcgruder officer with Athens city police was the first officer I met when I went to the station requesting to speak to the police chief. He also lied and confirmed that the police chief was on vacation. And would not offer any other information. Our next encounter was a phone call from me from the Athens city police, on March 4 when my son returned back to school a student told him He was a liar about being assaulted, and his finger was broken. Mcgruder tried to coerce my son into saying that they were just playing , and that nothing was wrong. I asked him to bring the child who assaulted my son to justice he said he was not going to do that I asked him what was the protocol for racial intimidation or retaliation he said I would have to speak to the principal Kara but he would not go get her to speak to me. I instantly left and took my son to the emergency room where we found out his bone was chipped In his finger, Mcgruder will come back after I left the emergency room I called they made me wait 30 minutes I actually called back then he came. He tried to coerce my son again into saying that this was just a joke and they were just playing he review the x-rays I told him to write a report properly. And not to speak to my son again. He would then go on to speak to my son and tell him that he was sorry for everything that was going on. On my third encounter with him I went to the school with legal representation to confront Tom Gibbs about my sons education issues, he came to the scene I refuse to speak to him because of the bogus report he did and how he refused to protect my son so I did not trust him I would later leave on to go to the mayors office to discuss this matter he failed to report child abuse, he failed to equally protect and he violated my sons rights to remain silent. It got to the point where I would call the police Station and request that he does not come on call. He would still come taunting me, Causing emotional duress Body Cameras we're on. I asked repeatedly. Depriving liberty and substantial due process as well as.Failure to Train
12. Tom Pyle is a police chief for Athens City police I initially met him at the mayors Steve Patterson's office to discuss this all of my son. I sat with him and another officer for over 30 minutes explaining the situation as well as showing substantial evidence that he agreed with substantial. He asked me what I wanted to see happen and I told him I wanted them arrested. I told him that I did not trust his officers and they fail to protect me and my son. Another officer even mentioned if you don't trust us why do you want us to protect you. I mention I want to protection by the sheriffs because I did not trust the police at that moment. No protection was provided.All recorded on camera. After my last encounter with Nick Mcgruder I headed to the mayors office where Tom Pyle was there instead of Steve Patterson, I explained to him his actions he did not do anything he tampered with evidence He failed to report child abuse, as well as failing to provide equal protection as well as depriving liberty without due process under equal protection laws. He acted in duress when he told me not to return back to the mayor's office unless I had a lawyer Intentionally causing emotional duress. When I left Tom Pyle I emailed attorney General Dave Yost about the situation and applied for the victim compensation program I was approved to make a claim Then I emailed this approval screenshot to Tom Pyle , And one hour later Dave Yost denied my claim. He deprived me of my liberty as well as substantial due process.Failure to Train

13. Andrew Foster is a police officer for Athens city police he took the report from Kara Bolin About my son mass text. He charged him with a misdemeanor and F1 felony charge of decimating a minor. With no findings he deprived our rights of substantial due process. Failure to Train.
14. Dave yost Ohio state attorney general approved my son's assault claim, but would then go on to deny me, after speaking with the police chief. I emailed Dave asking if the reason for my denial was because of the names, he had a representative call me back and say it was a mistake and I'm allowed to make my claim. I have been denied without due process. Shortly after He was also mass emailed and failed to report child abuse As well as fail to provide equal protection. As well as depriving liberty without due process. As well as neglect and negligence
15. Mike Dewine is Ohios Governor On March 5<sup>th</sup> I emailed him as well as others about the situation as well as all the evidence that I had. I never heard back from the governor, but I would go into the mayor's office mid the mayor and the police chief conversations about this very situation. I kept emailing him daily about the situations because he is responsible for the Superintendent as well as the mayor who is responsible for the police chief. He never responded, but he did have a representative contact me and at that point I had nothing to speak about he tampered with evidence failed to report child abuse failed to provide equal protection . As well as neglect and negligence.
16. Athens County sheriff's Department is where I Sent multiple emails to the sheriff on his page that says to contact him as well as go into the office multiple times to be turned around and harassed by sheriffs at the courthouse. They were acting in duress making Threats that they were going to kick me out of the court they were going to arrest me. Causing my anxiety to heavily increase, to the point where I had to be prescribed anxiety medicine. I was accused of being a lawyer and illegally practicing law They were trying to stop me from going in and filing my suits. The clerks in the court are also associated with the sheriffs and they were also acting in-duress intimidating me and others, not properly processing documents. Or not filing it at all. Failing to report child abuse, and failed to provide equal protection, as well as defamation of character. Deprived liberty and substantial due process Failure to Train
17. Athens County the Police Department every time I would call the dispatchers I was hung up on, this was March 4 2022 when my sons finger was broken I called straight from the hospital the same receptionist that's been hanging up on me the whole time says he's on an emergency car and he'll be there as soon as possible. I had to call back and ask if I was forgotten. I would call and request that Nick McGruder does not come on the calls and they would not respect the wishes and they would send him anyways. falsifying documents an officer Andrew Foster charged my son a minor with a F1 charge with no findings. I believe that is racially profiling and setting my son up for a future incident. I have made reports previously on other issues and they were not reported correctly I had videoed the neighbor assaulting a dog and I uploaded it on the police website and the young lady was not arrested for cruelty to animals. I would wait in the station for my reports and they would tell me they could not give it to me and would email them to me and when I was emailed them I did not agree what was written on the reports. I try to submit the physical evidence to the station they would not except it. Failed to provide equal protection under equal protection laws also, deprived liberty of And due process. and failure to Train

18. Southeast Ohio legal services is legal aid for low income residence, I requested service in regards to my sons education not issues being addressed. Caitlyn McDaniel answered the phone. She said she would be able to help me and we schedule a consultation, at first she was diligent about getting answers, then she became on responsive to emails she disregarded substantial evidence, and disregarded the abuse. She did partial investigating on the abuse part, which is a civil matter and came up with her findings of nothing happening. I try to speak to the supervising attorney Lucy Schawalle , she would not let me speak she did not wanna hear what I had to say, and she told me that the school did not have to accommodate my sons IEP. Which I felt this was detrimental to my case, and they did not address any of the issues.but would go on to release services.
19. Caitlyn McDaniel an attorney with Southeast Ohio legal services check on the case for my son regarding his IEP where we were to go address the superintendent and the principal about this matter, I also sent Kaitlyn all the evidence that I had regarding the situation. I emailed her very frequently with evidence, and when I would meet with her I asked her if she received my email she said she saw them but she hasn't read them yet, so after we leave for the first meeting with the superintendent where he does not attend where he threatens to trespass me if I return, I asked her if we could implement a safety plan, which she was supposed to provide assistance with and never did she never responded to the email so I personally forwarded the email to the superintendent This was A timely matter that needed to be addressed as soon as possible.I went to speak to her supervisor about the way she is representing me I'm seeking relief for neglect and negligence and failure to train ,I was deprived due process. Tower vs Glover
20. Rodney Smith sheriff Was emailed evidence as well as I sent it on Facebook and uploaded all evidence on there no response on any. But under his supervision the sheriffs would go onto harass and threaten and intimidate me. I wrote him a letter and he still did not respond back, he was tampering with evidence, failed to report child abuse, failure to train and , failed to provide equal protection under the equal protection law, and deprived liberty of due process. And failure to Train
21. Bob Blackburn is the director of education,3/31/2022 when I first spoke to him had no idea of any of the assaults on my son, he agreed to a safety meeting which he said was an IEP meeting but I only agreed to safety. Where he agreed that Elijah was safe where no safety measures were taken he would then go on to tell children services that I did not attend our meeting and I was not fit to train my son. He definitely made my character as a concern parent, and made it seem as if I did not attend or I did not care. Causing emotional distress.and anxiety. He refused to address any safety measures regarding my son. He failed to provide equal protection he failed to accommodate my son with an IEP and a letter from his doctor saying that he is not safe in the school. As well as failing to report an assault on a minor and Failure to Train
22. Athens municipal courts deputies and deputy Clerks-of Courts March 17,2022. -deprived liberty of due process, I was threatened, intimidated, and disregarded in regards to filing my suits. The two sheriffs at the doors were belligerent with me and would not help and threaten to throw me out of the court. I had to tell them that I just want to file my lawsuit.Constantly attempted to deny my liberty to due processAnd Failure to Train
23. Clerks of courts office where there had no idea of what I was trying to do. They became belligerent with me jumping out of their chairs, seeming to confront me or cause confrontation



the did not stamp all papers which could be detrimental to my case and caused dismissals, I was accused of illegally practicing law, I handed the clerk a judicial misconduct envelope and she mailed it back to me I did not have my address on it she mailed it back unopened. They attempted to hinder me from filing my complaints. Violating my liberty to due process.failure to Train

24. Candy Russell deputy clerk in the clerks of court office fail to train a basic office procedures, No one had any idea how to file a civil forms. They became belligerent and upset when they did not know how to process them when I asked her to stamp each paper she would skip over pages which could be detrimental to my case and could cause a dismissal. I Worked in the courthouse March 17 and I handed her a judicial misconduct envelope I'll said on it was judicial misconduct she was supposed to forward it to the right administers, but she would then go on to mail it back to me.
25. Ron Hawk is a sheriff He acted in duress in the courthouse intimidating me yelling at me threatening to arrest me, threatening to put his hands on me physically and throwing me out of the court. Trying to hinder me from filing my lawsuit. Depriving me of my liberty of due process. Telling me to shut up and I better have some respect for him.failure
26. City of Athens the city is responsible for all negligent acts from City Officials. Had they were Trained properly these negligent acts could have been avoided.I went to the city of Athens mayor office multiple times and never was able to speak to the mayor he was actually present in his office March 11,2022 when I have a meeting with Tom Pyle but he did not come in to address me. Steve Pattersons secretary told me that Steve and Tom were in meeting about my very situation.he failed to report child abuse as well as failing to provide equal protection. As well as failing to protect my liberty to due process.
27. Steve Patterson is the mayor of Athens OH I emailed him with all my evidence as well as made multiple attempts to see him. Our first encounter was not actually an encounter I was heading to the mayor's office and I spoke to the secretary telling her how upset I was and what was going on she told me that they were in meeting about this at this very moment and I could just a seat and they will be with me shortly . The mayor never joins the meeting . he was in his office while me and Tom Pyle had a discussion about this situation. He failed to report child abuse, endangering Minors , And failed to provide equal protection. And deprive my liberty to due process. As well as failure to teain
28. Athens city schools is responsible for the negligence that caused my son's finger to be broke broken, as well as the assault from the teacher as well as him missing school Unfair unequal treatment excessive punishment assault on a minor defamation of character. Intimidation retaliation. As well as his anxiety levels being heightened to the extent where he could not return back to school. All acts done in duress or emotional duress As well As failure to Train staff and students. As well as condoning racial retaliation, discrimination, as well as violations of the school districts policies.
29. Campus Height Is a apartment complex for student living as well as low income families. I implemented them because they are unfairly treating lower income tenants like myself , By not giving us proper notice.. Entering our apartment without notice. Ever since I have implemented

them In the previous suit . The property owners as well as managers has been refusing to do any repairs in my house my home is infested with roaches I've seen mice. I was told the did not have the funds to make the repairs I haven't had screens in my window for years. I've sent videos no repairs are being done. But They remodeling student housing at leisure. The manager says she is not allowed to speak to me or release my files unless I subpoena them or release my files unless I subpoena them. I have made several complaints about repairs and they refuse to enter my home to do the necessary repairs on my apartment on my HUD based apartment I'm asking for due to discrimination and retaliation as well as misappropriation of Government funds and failure to Train property

30. Ricky Hysell Is the unlicensed property manager of campus Heights Apartments. Ricky has walked into my apartment without giving notice, my daughter just had surgery on her tail bone and she was exposed. He walked in My Home and as I was walking my dog he walked in with four other guys left out and lock my door. I immediately went to him and made him open my door and told him he is not allowed to come into my apartment without notice. He said hud told him he had to come in. I'm asking For relief due to discrimination and retaliation. as well as misappropriation of Government Funds.

(march 2, 2022- Present )

Kara Bolin  
5996 Rossetter rd. Albany Ohio 45710

Tom Gibbs  
12 Birge Dr Chauncey Ohio 45719

Steven Roach  
12 Birge Dr Chauncey Ohio 45719

Jeff Skinner  
12 Birge Dr Chauncey Ohio 45719

Angela Hall  
12 Birge Dr Chauncey Ohio 45719

Athens County Children Services  
18 Stony Brook drive Athens OH 45701

Mandi Knowlton -Cain  
18 StonyBrook Dr Athens OH 45701

Carly Ferguson  
18 Stonybrook Dr., Athens, OH 45701

Derrick Johnson  
11 N.college st Athens, OH 45701

Ross Holter  
11 N college St. Athens OH 45701

Nick McGruder  
11 N. College St Athens OH 45701

Tom Pyle  
11 N. College st Athens oh 45701

Athens city Police Department  
11 N. College St., Athens, OH 45701

Andrew Foster  
11 N. College St Athens Ohio 45701

Dave Yost  
4679 Winterset Dr.  
Columbus, OH 43220

Mike Dewine  
30th Floor 77 South High Street Columbus, OH 43215

Athens County Sherriffs Department  
13 West Washington St Athens OH 45701

Athens County Police Department  
11 N. Court St., Athens, OH 45701

Southeast Ohio legal services

South Eastern Ohio Legal Services

964 E. State Street Athens, OH 45701

Caitlyn McDaniel

964 E. State Street Athens, OH 45701

Rodney Smith

13 W Washington St Athens OH 45701

Bob Blackburn

12 Birge drive Chauncey Ohio 45701

Athens Municipal Court

1 S court St Athens OH 45701

Clerks of courts

1 S court St 4<sup>th</sup> floor Athens OH 45701

Ron hawk

13 W. Washington St

Athens, Ohio 45701

Athens city schools

12 Birge Dr Chauncey Ohio 45701

Steve Patterson

8 W. Washington st Athens, OH 45701

Campus Heights Apartments

115 carriage hill dr Athens, OH 45701

Ricky Hysell

115 carriage hill dr Athens OH 45701

Candy Russell

1 South court St Athens OH 45701

IV. Previous lawsuits:

If you have been a Plaintiff in a lawsuit, for each lawsuit state the case number and caption.  
(Example, Case Number: 2:08-cv-728 and Caption: John Smith vs. Jane Doe).

Case Number

Caption

22-cv-0033

Emulard

vs.

Tom Pyle et al

vs.

vs.

V. Relief

In this section please state (write) briefly exactly what you want the court to do for you. Make no legal argument, cite no case or statutes.

I would like to sue for monetary damages, as well as punitive or exemplary damages for all acts <sup>done</sup> negligently and or in duress for emotional distress, loss in wages and my liberty to live without protection. Increased Anxiety, pain and suffering and personal injury damages due to negligence.

I state under penalty of perjury that the foregoing is true and correct. Executed on

this 22 day of June, 2022

Geoff Hulbert

Signature of Plaintiff